

STATE OF INDIANA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
PUBLIC NOTICE NO. 20211029 INP000171 – D
DATE OF NOTICE: OCTOBER 29, 2021
DATE RESPONSE DUE: NOVEMBER 29, 2021

The Office of Water Quality proposes the following NPDES DRAFT PERMIT:

PRETREATMENT – MODIFICATION

CROWN EQUIPMENT CORPORATION, Permit No. INP000171, PUTNAM COUNTY, 2600 East SR 240, Greencastle, IN. This industrial pretreatment facility manufactures powered industrial lifts and discharges 0.06 million gallons daily of sanitary and non-process wastewater to the Greencastle POTW. The modification request is to adjust effluent limits to match local sewer use ordinance limits. Permit Manager: Richard Hamblin, 317/232-8696, rhamblin@idem.in.gov. Posted online at <https://www.in.gov/idem/public-notices/>.

PROCEDURES TO FILE A RESPONSE

Draft can be viewed or copied (10¢ per page) at IDEM/OWQ NPDES PS, 100 North Senate Avenue, (Rm 1203) Indianapolis, IN, 46204 (east end elevators) from 9 – 4, Mon - Fri, (except state holidays). A copy of the Draft Permit is on file at the local County Health Department. Please tell others you think would be interested in this matter. For your rights & responsibilities see: Public Notices: <https://www.in.gov/idem/public-notices/>; Citizen Guide: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>. Please tell others whom you think would be interested in this matter.

Response Comments: The proposed decision to issue a permit is tentative. Interested persons are invited to submit written comments on the Draft permit. All comments must be postmarked no later than the Response Date noted to be considered in the decision to issue a Final permit. Deliver or mail all requests or comments to the attention of the Permit Writer at the above address, (mail code 65-42 PS).

To Request a Public Hearing:

Any person may request a Public Hearing. A written request must be submitted to the above address on or before the Response Date noted. The written request shall include: the name and address of the person making the request, the interest of the person making the request, persons represented by the person making the request, the reason for the request and the issues proposed for consideration at the Hearing. IDEM will determine whether to hold a Public Hearing based on the comments and the rationale for the request. Public Notice of such a Hearing will be published in at least one newspaper in the geographical area of the discharge and sent to anyone submitting written comments and/or making such request and whose name is on the mailing list at least 30 days prior to the Hearing.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

October 29, 2021

VIA ELECTRONIC MAIL

Mr. Kris Ladd, EHS Manager
Crown Equipment Corporation
2600 East State Road 240
Greencastle, IN 46135

Dear Mr. Ladd:

Re: IWP Permit No. INP000171
Draft Permit Modification
Crown Equipment Corporation
Greencastle, IN – Putnam County

Your request for a permit modification has been reviewed and processed in accordance with rules adopted under 327 IAC 5. The enclosed Pages 1 through 3 of 26 are intended to replace the corresponding pages of your existing IWP Permit No. INP000171. An accompanying Briefing Memo itemizes and explains the rationale for the revisions.

Pursuant to IC 13-15-5-1, IDEM will publish the draft permit document online at <https://www.in.gov/ide/public-notices/>. Additional information on public participation can be found in the "Citizens' Guide to IDEM", available at <https://www.in.gov/ide/resources/citizens-guide-to-idem/>. A 30-day comment period is available to solicit input from interested parties, including the public.

Please review this draft permit modification and associated documents carefully to become familiar with the proposed terms and conditions. Comments concerning the draft permit modification should be submitted in accordance with the procedure outlined in the enclosed public notice form. We suggest that you meet with us to discuss major concerns or objections you may have with the draft permit modification.

Questions concerning this draft permit modification may be addressed to me at 317/232-8696 or by email at rhamblin@idem.in.gov.



Mr. Kris Ladd, EHS Manager
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Sincerely,

Nikki Gardner for

Richard Hamblin, Chief
Industrial NPDES Permits Section
Office of Water Quality

Enclosures

cc: Putnam County Health Department
Greencastle POTW
Leigh Voss, IDEM Municipal Permits Section Chief
Holly Zurcher, IDEM Inspector
Richard Hamblin, IDEM

STATE OF INDIANA

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AMENDED AUTHORIZATION TO DISCHARGE UNDER THE
INDUSTRIAL WASTEWATER PRETREATMENT PROGRAM

INDUSTRIAL WASTEWATER PRETREATMENT (IWP) PERMIT

In accordance with 327 IAC 5-21 and IDEM's permitting authority under IC 13-15, **Crown Equipment Corporation** (hereinafter referred to as the permittee) is authorized to discharge from the facility located at 2600 East State Road 240, Greencastle, Indiana into the Greencastle Publicly Owned Treatment Works (POTW), in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in Parts I and II hereof.

The permit, as issued on October 12, 2018, is hereby amended, as contained herein. The amended provisions shall become effective _____. All terms and conditions of the permit not modified at this time remain in effect. Further, any existing condition or term affected by the amendments will remain in effect until the amended provisions become effective. This permit and the authorization to discharge, as amended, shall expire at midnight **November 30, 2023**.

NOTE: In order to receive authorization to discharge beyond the date of expiration, the permittee must submit a renewal IWP permit application to the Industrial NPDES Permit Section in the Office of Water Quality, no later than one hundred and eighty (180) days prior to the date this permit expires. Failure to do so will result in expiration of the authorization to discharge.

Signed on _____ for the Indiana Department of
Environmental Management.

Jerry Dittmer, Chief
Permits Branch
Office of Water Quality

PART I

(A) EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

(1) During the period beginning on the effective date of this permit, the permittee is authorized to discharge from Outfall 001[1][2]. Outfall 001 is located after the sump pit. Such discharge shall be limited and monitored by the permittee as specified below:

Table 1

<u>Parameter</u> [3]	<u>Discharge Limitations</u>		<u>Unit</u>	<u>Monitoring Requirements</u>	
	<u>Daily Maximum</u>	<u>Monthly Average</u>		<u>Measurement Frequency</u> [5]	<u>Sample Type</u> [4]
Flow [6]	Report	Report	MGD	Daily	24 Hr. Total
Cadmium [Cd]	0.5[7]	Report	mg/l	2 X Year	24 Hr. Comp.
T. Chromium [Cr(T)]	3.0[7]	Report	mg/l	2 X Year	24 Hr. Comp.
Copper [Cu]	1.6[7]	Report	mg/l	1 X Quarter	24 Hr. Comp.
Lead [Pb]	0.25[7]	Report	mg/l	2 X Year	24 Hr. Comp.
Nickel [Ni]	2.0[7]	Report	mg/l	2 X Year	24 Hr. Comp.
Silver [Ag]	0.54[7]	Report	mg/l	2 X Year	24 Hr. Comp.
Zinc [Zn]	5.0[7]	Report	mg/l	1 X Quarter	24 Hr. Comp.
T. Cyanide[CN(T)][8]	0.07[7]	Report	mg/l	2 X Year	Grab
TTO[9]	Report	-----	mg/l	2 X Year	Grab

Table 2

<u>Parameter</u>	<u>Quality or Concentration</u>			<u>Monitoring Requirements</u>	
	<u>Daily Minimum</u>	<u>Daily Maximum</u>	<u>Units</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
pH[7]	6.0	9.0	s.u.	Daily	Grab

- [1] Outfall 001 shall be designated as the combined wastestreams at the sampling point.
- [2] The discharge shall not exceed the local limits in the Sewer Use Ordinance upon entering the POTW.
- [3] All metals shall be analyzed as Total Recoverable Metals.
- [4] The daily composites must be flow-proportional samples consisting of aliquots withdrawn throughout the daily discharge period. The aliquots may be: (i) uniform aliquots withdrawn at uniform flow intervals; (ii) flow-proportional aliquots withdrawn at uniform time intervals; or (iii) for batch discharge, uniform aliquots withdrawn from uniform batch volumes.

Alternatively, a 24-hour composite sample may be obtained by an automatic sampler on an equal time interval basis over a twenty-four hour period provided that a minimum of 24 samples are taken and combined prior to analysis. The samples do not need to be flow-proportioned if the permittee collects samples in this manner.

- [5] Parameters that are to be monitored twice per year shall be reported during the months of June and December. If, however, two other months are more appropriate, the permittee may request to report in two alternate months, or the State may require the permittee to report during two alternate months.

In situations of intermittent or batch discharge, all parameters required to be monitored should be sampled during the first representative discharge occurring during the monitoring period and then reported on the appropriate state and federal forms at the end of the monitoring period.

If a representative discharge occurs at any time during the monitoring period as identified for that individual parameter, then it is a violation of this permit to not collect a sample and report those results. At the first opportunity that a representative discharge occurs during the monitoring period, it should be sampled for all the required parameters during that monitoring period. Waiting to collect a sample until the end of a monitoring period risks missing a representative sample collection opportunity, and it is considered a violation of this permit to not collect a sample, analyze and report those results, when there was a discharge for that monitoring period.

- [6] The flow must be measured and recorded using valid flow measurement devices, not estimated. The flow monitoring device must be calibrated at least once every twelve (12) months.
- [7] Based on local ordinance [City of Greencastle Municipal SUO; Article 7, Division II, Sec. 9-74].
- [8] The CN(T) parameter includes all cyanide, chelated (bound to heavy metals) and unchelated (free). The Metal Finishing Standard for CN(T) applies only to the CN-bearing flows prior to mixing with the non-CN Metal Finishing flows. Since the permittee does not use CN, the CN(T) samples should be collected at the end-of-process site.
- [9] The Total Toxic Organics (TTO) parameter is defined as the sum of the concentration values above .01 mg/l for the toxic organic compounds that constitute this parameter under the applicable categorical standard. See part I.D. ("TTO MONITORING REQUIREMENTS") of this permit.



Industrial Wastewater Pretreatment (IWP)

Briefing Memo for
Crown Equipment Corporation
Draft modification: October 2021
Final modification:

Indiana Department of Environmental Management

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

Permittee:	Crown Equipment Corporation 2600 East State Road 240 Greencastle, IN 46135
Existing Permit Information:	Permit Number: INP000171 Expiration Date: November 30, 2023
Facility Contact:	Kris Ladd, EHS Manager (765)653-4240 or kris.ladd@crown.com
Facility Location:	2600 East State Road 240 Greencastle, IN 46135
Receiving POTW:	Greencastle POTW NPDES Permit #: IN0021032
Proposed Permit Action:	Modify
Source Category	Industrial Pretreatment
Permit Writer:	Richard Hamblin (317)232-8696 or rhamblin@idem.in.gov

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1.0 INTRODUCTION

The Indiana Department of Environmental Management (IDEM) received a request from the permittee on August 24, 2021, to modify Industrial Wastewater Pretreatment (IWP) Permit INP000171. The current five year permit was issued with an effective date of December 1, 2018, in accordance with 327 IAC 5-2-6(a).

In accordance with Title 40 of the Code of Federal Regulations (CFR) Sections 124.7 and 124.56, as well as Indiana Administrative Code (IAC) 327 Article 5, development of a Statement of Basis, or Briefing Memo, is required for NPDES permits. This document fulfills the requirements established in those regulations.

This Briefing Memo identifies the basis for this modification to the permit and the modified pages of the permit issued on October 12, 2018.

2.0 PERMIT MODIFICATION

2.1 Modification Request

Crown's existing IWP permit expires on November 30, 2023. However, the following manufacturing processes at the facility have changed since the previous IWP permit application in June 2018 and the change in washer chemicals letter submitted to IDEM in September 2019.

- The seven-stage washer system no longer includes a phosphating bath (Tank 1 in previous permit application) and is now operating as a six-stage washer with no phosphating step in Tank 1. Crown discontinued the use of phosphating in Tank 1 of the seven-stage washer system in February 2020. Tank 1 is no longer in use and is not expected to return to use as a phosphating bath. An updated washer system diagram is included in the application for modification. Crown is hereby requesting that IDEM no longer regulate the facility's process wastewaters under 40 CFR 433 Metal Finishing because Crown no longer performs the phosphating process that triggered regulation under 40 CFR 433. While still remaining a Significant Industrial User due to having a flow > 25,000 gallons per day, Crown believes that the IWP permit limits for should be adjusted to reflect Greencastle's sewer use ordinance limits.
- The batch treatment system has not been needed since the phosphating bath was removed from the seven-stage washer in February 2020. Crown is no longer operating the batch wastewater treatment system that was installed in 2017 for treatment of the spent phosphating baths from Tank 1 of the seven-stage washer system. As noted above, Crown has eliminated the use of the phosphating bath, and all other wastewaters generated by the seven and five-stage washer systems require only pH adjustment prior to discharge to be compliant with permit limitations. With IDEM's concurrence, Crown intends to remove the batch treatment system and utilize the space for other manufacturing operations.

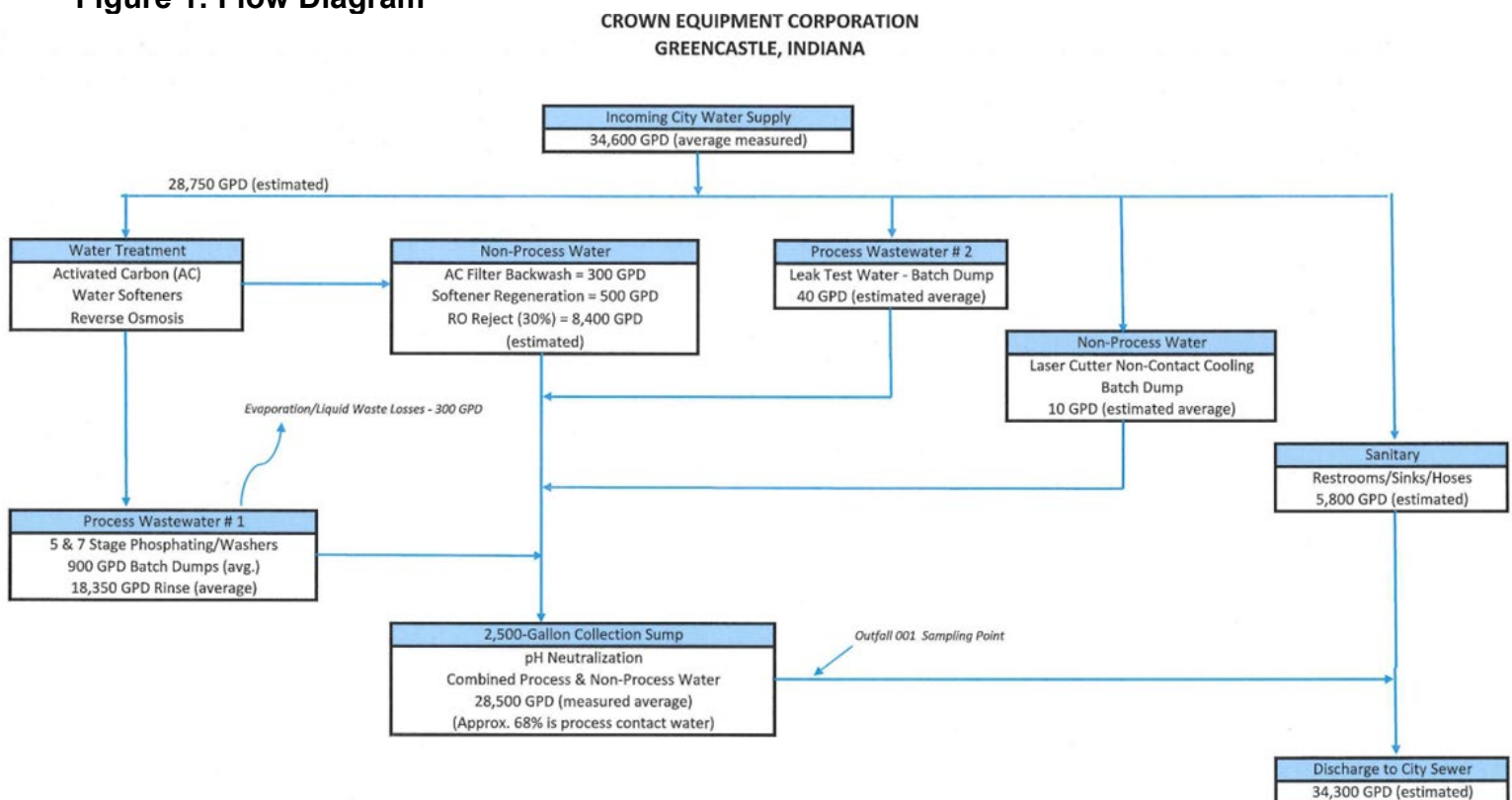
- Water use and discharge has increased due to increases in production before and after COVID 19 reductions in manufacturing operations. An updated water use schematic is included with this application.

2.2 IDEM's Proposed Modification

The effluent limitations in the current permit are based on adjusted Effluent Limitation Guidelines (ELGs) found in 40 CFR 433.17 – Metal Finishing Point Source Category and the Greencastle Sewer Use Ordinance (SUO), whichever is more stringent. 40 CFR 433 applies to "... plants which perform any of the following six metal finishing operations on any basis material: Electroplating, Electroless Plating, Anodizing, Coating (chromating, phosphating, and coloring), Chemical Etching and Milling, and Printed Circuit Board Manufacture." Since the facility has ceased phosphating, the ELGs of 40 CFR 433 are no longer applicable. However, the facility does qualify as a Significant Industrial User in accordance with 327 IAC 5-17-23. Therefore, and IWP is still required.

A flow diagram of current operations is provided as Figure 1 below.

Figure 1: Flow Diagram



Notes:

Measured averages are based on 2019 and 2021 data (no 2020 data was used due to Covid-19 downturn)
Measures values were rounded to nearest 50 gallons.

The parameters and monitoring frequency in the permit will remain unchanged. The applicable effluent limits are now solely from the Greencastle SUO. The limits in the Greencastle SUO are expressed as daily maximums and do not include monthly average limits. The following limitations are included in this modification and are applicable at the end of pipe. Pages 1 through 3 of 26 of the permit will be updated.

Parameter	Daily Maximum (mg/l)
Cadmium	0.5
Chromium	3.0
Copper	1.6
Lead	0.25
Nickel	2.0
Silver	0.54
Zinc	5.0
Cyanide	0.07
TTO	Report

3.0 Permit Processing/Public Comment

Pursuant to IC 13-15-5-1, IDEM will publish the draft permit document online at <https://www.in.gov/idem/public-notice/>. Additional information on public participation can be found in the "Citizens' Guide to IDEM", available at <https://www.in.gov/idem/resources/citizens-guide-to-idem/>. A 30-day comment period is available to solicit input from interested parties, including the public.